

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-33 and 35 are pending in the present application, Claims 1-3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-27, 31-33 and 35 having been amended, and Claims 4, 8, 12, 16, 20, and 24 having been canceled without prejudice or disclaimer. Support for the amendments to Claims 1-3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-27, 31-33 and 35 is found, for example, Figs. 1A-2, and their corresponding descriptions in the specification, and the appendices attached to the specification. Applicants respectfully submit that no new matter is added.

In the outstanding Office Action, Claim 34 was rejected under 35 U.S.C. §112, first paragraph; Claims 1-3, 5-7, 9-11, 13-15, 17-19, 21-23, and 25-35 were rejected under 35 U.S.C. §103(a) as anticipated by Rada et al. (*Hypertext Interchange Using ICA*, June 1995, pages 99-117, hereinafter Rada) in view of Linden et al. (*ALCHEMIST: A General Purpose Transformation Generator*, department of computer science, University of Helsinki Finland, Report C-1995-43, September 1995, hereinafter Linden); and Claims 4, 8, 12, 16, 20, and 24 were rejected under 35 U.S.C. §103(a) as anticipated by Rada in view of Linden, and further in view of Burnard (*SGML on the Web: Too Little Too Soon, or Too Much Too Late?*, Nov. 1, 1996, pages 1-9).

The rejection of Claim 34 under 35 U.S.C. §112, first paragraph, is moot in view of its cancellation.

With respect to Linden, the email from the author attached to the Office Action does not prove that Linden is prior art as of September 1995. The email does not disclose or suggest that Linden was indexed in a meaningful way so as to be obtainable to those

interested in the work. Furthermore, the email from the author does not show that the author knew the legal definition of “publication.”

However, the author identified an alternative publication in the Wiley journal Software – Practice and Experience. The Office is requested to obtain a copy of this document since it appears to have a publication date.

To advance prosecution, Applicant will explain why the present claims distinguish over Linden.¹

With respect to the rejection of Claim 1 as unpatentable over Rada and Linden, Applicants respectfully submit that the amendment to Claim 1 overcomes this ground of rejection. Amended Claim 1 recites, *inter alia*,

transforming a first document or database structure provided in the first native structured format directly into a second document or database structure in the second native structured format based on the translation information, without using an intermediate representation of the first document or database structure.

Rada and Linden do not disclose or suggest the above-noted elements of Claim 1.

Rada describes the Integrated Chameleon Architecture (ICA), which is a toolset for generating translators among different text markups. Rada states “The ICA is based on an intermediate format or markup language...the Recoding Toolset changes the markup codes by replacing codes in an original data representation with their intermediate format counterparts.”² Thus, Rada does not disclose or suggest the claimed “transforming a first document or database structure provided in the first native structured format directly into a second document or database structure in the second native structured format based on the

¹ This is not an admission that Linden in prior art.

² Rada, section 2.1 on page 100.

Linden, like Rada, uses an intermediate format to perform a translation. Fig. 8 of Linden illustrates the translation process, and requires that the source be first converted into an intermediate “source parse tree.” Linden states “The file-to-object parser reads the source file and builds an intermediate representation, a source parse tree over the source grammar.”³ Thus, Linden does not disclose or suggest “transforming a first document or database structure provided in the first native structured format directly into a second document or database structure in the second native structured format based on the translation information, without using an intermediate representation of the first document or database structure.”

In the claimed invention, the translation does not require an intermediate format. Rather, a first document in a first native format is translated into a second document in a second native format. This is explained in the specification, at page 17, line 12 to page 20, line 20. In this example, an SGML document is directly translated into HTML, without using an intermediate format.

Furthermore, Burnard does not cure the above-noted deficiencies in Rada and Linden.

In view of the above-noted distinctions, Applicants respectfully submit that Claim 1 (and Claims 2-16, 25, dependent thereon 28-35 dependent thereon) patentably distinguish over Rada, Linden, and Burnard, taken alone or in proper combination.

In addition, Claims 9 and 17 recite elements analogous to those of Claim 1. Thus, Applicants respectfully submit that Claims 9 and 17 (and Claims 10-16, 18-27, 29, and 30 dependent thereon) patentably distinguish over Rada, Linden, and Burnard, taken alone or in proper combination.

³ Linden, page 17.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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